

EXHIBIT A

Exhibit I

I. DOCUMENTS REQUESTED

1. All documents relating to the Debtor including but not limited to documents reflecting its operations, financial affairs, and relationship to Related Entities.
2. All documents relating to the Related Entities, including but not limited to David Nilsen dba Cedar Funding; Cedar Funding Mortgage Fund LLC; Accustom Development LLC; Cedar Properties, Inc; North First & Greenfield LLC; Lake Elizabeth Properties LLC or David Nilsen dba Lake Elizabeth RV Resort; River Grove Resort LLC or River Grove Park, LLC; DKN Interests, L.L.C.; Belavida Court, Inc.; La Cobre Mina Owners Association; and Black Creek Ranch, LLC. Documents include, but are not limited to documents reflecting operations, financial affairs, and relationship to the Debtor as well as operating agreements, subscription agreements, financial statements, general books and records, banking records, and filed and completed tax returns and filed and amended tax returns.
3. All documents concerning investments by You in the Debtor or Related Entities.
4. All documents concerning income, payments or fund transfers by Debtor or Related Entities to You; and all documents concerning subsequent transactions and/or investments made by You with these funds. Documents include, but are not limited to account statements, bank statements, brokerage statements, investment statements, financial statements, mortgage statements, line-of-credit statements, documents reflecting interest payments, equity distributions, loan repayments, payments in exchange for the sale or transfer of interests, and fees of any kind (e.g., service fees, management fees, subscription fees, operation fees, late fees), credit card statements, wire transfer confirmations, cancelled checks, check copies, check stubs, check vouchers, debit memos and credit memos.
5. All documents concerning investments in the Debtor or Related Entities by Your relatives or family members.
6. All documents concerning income, payments or fund transfers by Debtor or Related Entities to Your relatives or family members.

7. All documents concerning interests in real properties owned or managed by You since January 1, 2004; and all documents regarding real properties transactions or transfers by the Debtor or Related Entities to You or relatives or family members.

8. All documents concerning the Debtor's Loan Number 4963 and real property securing that loan, including but not limited to 7 Yankee Point Drive, Carmel, California 93923.

9. All of Your completed and filed tax returns and filed and amended tax returns since January 1, 2004, including but not limited to W-2's, 1099's and Schedule K-1's.

10. All documents reflecting Your financial affairs since January 1, 2004, including but not limited to bank statements, wire transfer confirmations, cancelled checks, check copies, check stubs, check vouchers, debit memos, credit memos, credit card statements, mortgage statements, line-of-credit statement, account setup documentation, investment statements of any kind, brokerage statements, financial statements, safe deposit box information, promissory notes and purchase and sale agreements.

11. All documents concerning the sale, transfer, or foreclosure of interests in real properties held by You, the Debtor, or Related Entities.

12. To the extent not otherwise produced, all documents in Your possession, custody, or control that reflect Communications with title companies.

13. To the extent not otherwise produced, all documents in Your possession, custody, or control that reflect Communications with investors of the Debtor or Cedar Funding Mortgage Fund LLC.

14. To the extent not otherwise produced, all documents in Your possession, custody, or control that reflect assignments of deeds of trust to or from the Debtor, Related Entities or investors of the Debtor or Cedar Funding Mortgage Fund LLC since January 1, 2004.

15. To the extent not otherwise produced, all documents that reflect business entities under Your management or control since January 1, 2004.

II. DEFINITIONS

When used herein, the following terms shall have the meanings indicated below:

“Debtor” shall refer to Cedar Funding, Inc., including its officers, employees, agents, representatives, affiliates, successors and assigns.

“Related Entities” shall refer to any and all entities related to the Debtor and/or David A. Nilsen, including but not limited to David Nilsen dba Cedar Funding; Cedar Funding Mortgage Fund LLC; Accustom Development LLC; Cedar Properties, Inc; North First & Greenfield LLC; Lake Elizabeth Properties LLC or David Nilsen dba Lake Elizabeth RV Resort; River Grove Resort LLC or River Grove Park, LLC; DKN Interests, L.L.C.; Belavida Court, Inc.; La Cobre Mina Owners Association; and Black Creek Ranch, LLC., their members, directors, officers, employees, agents, representatives, affiliates, successors and assigns.

“You” or “Your” shall refer to Steve Poletti, including his agents and representatives.

“Document” is used in its broadest sense and shall mean any written or electronically stored information, including but not limited to, writings of any description, notes, correspondence, emails, agreements, faxes, memoranda, summaries, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations in any medium from which information can be obtained.

“Communications” shall refer to all conversations, agreements, inquiries, or replies whether in person, by telephone, in writing, or by means of electronic transmittal devices, and includes, but is not limited to, all correspondence, transmittal slips, facsimiles, electronic mailings, memoranda or notes.

The singular form of a word shall also refer to the plural, and vice versa, the terms “and” and “or” mean “and/or,” and words used in the masculine, feminine or neuter genders refer to and include all genders.

III. INSTRUCTIONS

In responding to this Document Request, You should furnish all Documents in Your possession, custody or control. In addition, You are requested to furnish all Documents and information available to all persons acting on Your behalf (including but limited to Your agents, representatives, consultants and affiliates).

If You cannot produce all Documents and information responsive to a request after exercising due diligence to secure them, so state and furnish Documents and information to the extent possible, specifying Your inability to furnish the remainder and stating whatever information You have concerning the unavailable Documents and information. If Your responses are qualified in any particular manner, set forth the details of such qualification.

If You object to any part of the Discovery and refuse to furnish Documents and information responsive to that part, state Your objection(s) and furnish Documents and information responsive to the remaining portion of that particular request. If You object to the scope or time period of a request and refuses to produce Documents and information for that scope or time period, state Your objection and furnish Documents and information responsive to the request for the scope or time period that You contend is appropriate.

In the event that You assert the attorney-client privilege and/or the work product doctrine or any other privilege as to any Document requested by any of the discovery requests, then, as to each such assertion, identify the Document or copy thereof, the nature of the privilege claimed and the facts or grounds supporting the claim or privilege in sufficient detail to permit the Bankruptcy Court to reach a determination as to the propriety of such assertion.

If any Document described herein was, but no longer is, within Your possession custody or control, or that of a person acting on behalf, state in detail: (i) a summary of the contents of the Document; (ii) what disposition was made; (iii) the date of such disposition; (iv) the reason for such disposition; (v) whether the original or a copy thereof is within the possession, custody or control of any other person, corporation or entity; and (vi) if the answer to (v) is an affirmative, the identity of that entity.